

TROUTMAN PEPPER LOCKE LLP

Tambry L. Bradford (SBN 223282)
Two California Plaza
350 South Grand Avenue
Suite 3400
Los Angeles, CA 90071
Telephone: 213.928.9805
Email: Tambry.Bradford@troutman.com

Robin P. Sumner (admitted *pro hac vice*)
Kyle A. Dolinsky (admitted *pro hac vice*)
3000 Two Logan Square
Eighteenth and Arch Streets
Philadelphia, PA 19103
Telephone: 215.981.4000
Email: Robin.Sumner@troutman.com
Email: Kyle.Dolinsky@troutman.com

Attorneys for Defendants
CVS Pharmacy, Inc.,
Amneal Pharmaceuticals of New York, LLC, and
Amneal Pharmaceuticals LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CHERI LEONARD, *on behalf of herself and*
all others similarly situated,

Plaintiff,

v.

CVS PHARMACY, INC., AMNEAL
PHARMACEUTICALS OF NEW YORK,
LLC, and AMNEAL PHARMACEUTICALS
LLC,

Defendants.

Case No. 5:24-cv-06280

**DEFENDANTS' REPLY IN SUPPORT OF
MOTION TO STAY DISCOVERY PENDING
DECISION ON DEFENDANTS' MOTION
TO DISMISS**

Date: March 27, 2025
Time: 9:00 a.m.
Judge: Hon. Edward J. Davila
Crtrm: 4

1 **I. INTRODUCTION**

2 Plaintiff Cheri Leonard’s Opposition to the Motion to Stay Discovery (the “Opposition”)
 3 (ECF 52) filed by Defendants CVS Pharmacy, Inc. (“CVS”), and Amneal Pharmaceuticals of New
 4 York, LLC, and Amneal Pharmaceuticals LLC (collectively, “Amneal”) ¹ fails to address
 5 Defendants’ arguments in support of a stay in favor largely irrelevant arguments that misconstrue
 6 and misapply the applicable standard. Nothing in the Opposition weighs in favor of denying
 7 Defendants’ Motion to Stay Discovery (the “Motion”) (ECF 50).

8 First, Plaintiff argues that Defendants’ Motion to Dismiss is not potentially dispositive of
 9 Plaintiff’s entire case because the arguments raised by Defendants are “unavailing” and “unlikely
 10 to dispose of the entire case.” As this Court has explained, “*likelihood of success is not the standard*
 11 *for a stay of discovery.*” *Muhmoud v. City of San Jose*, No. 20-cv-8808, 2022 WL 16855573, at *2
 12 (N.D. Cal. Nov. 10, 2022) (emphasis added) (Davila, J.). The Court need determine only that the
 13 motion raises non-frivolous arguments that could potentially dispose of the whole case. In so doing,
 14 the Court considers the motion as a whole. No individual argument need be case dispositive alone.

15 Second, after appearing to concede that the Court *can* resolve the Motion to Dismiss without
 16 discovery, Plaintiff suggests jurisdictional discovery *may* be helpful *if* the Court grants the Motion
 17 to Dismiss. Plaintiff’s arguments do not support allowing full discovery to proceed, nor do they
 18 meet the standard for limited jurisdictional discovery, which requires a showing of need to resolve
 19 contested *facts*.

20 Finally, Plaintiff attempts to paint the stay sought by Defendants—a short pause while the
 21 Court decides the pending Motion to Dismiss—as an unacceptable inefficiency. Both case law and
 22 the facts of this case make clear, however, that it would be far more burdensome and inefficient to
 23 conduct broad merits discovery in the face of the potentially case-dispositive Motion to Dismiss.

24 For the reasons set forth herein, the Court should grant Defendants’ Motion.

25 _____
 26 ¹ For ease of reference, CVS and Amneal will refer to all defendants collectively as “Defendants”
 27 when appropriate.

1 **II. ARGUMENT**

2 **A. The *Pacific Lumber* Factors Weigh in Favor of a Stay**

3 Courts may stay discovery when a potentially dispositive motion is pending and (1) the
4 pending motion can dispose of the entire case, and (2) no additional discovery is needed to decide
5 the motion. *See Pac. Lumber Co. v. Nat'l Union Fire Ins. Co. of Pittsburgh, PA*, 220 F.R.D. 349,
6 352 (N.D. Cal. 2003). Applying that standard correctly, a stay is warranted here.

7 **1. Defendants' Motion to Dismiss is potentially case dispositive**

8 With respect to the first prong of the *Pacific Lumber* test, Plaintiff argues that certain of
9 Defendants' individual arguments are unlikely to succeed and are not case-dispositive. Both points
10 misconstrue the legal standard and are factually incorrect.

11 As this Court has explained, "*likelihood of success is not the standard for a stay of*
12 *discovery.*" *Muhmoud*, 2022 WL 16855573, at *2 (emphasis added). Rather, a stay of discovery is
13 appropriate if there are non-frivolous arguments that are "*potentially* dispositive of the entire case."
14 *Id.* (emphasis in original); *see also Arcell v. Google, LLC*, No. 22-cv-2499, 2022 WL 16557600, at
15 *1 (N.D. Cal. Oct. 31, 2022) (Davila, J.). Contrary to Plaintiff's argument (ECF 52 at 3-4, 5-6), the
16 Court may take a "preliminary peek" at the arguments in the Motion to Dismiss only to determine
17 whether, *if granted*, the motion *could* dispose of the entire case. *Pacific Lumber Co. v. Nat'l Union*
18 *Fire Ins. Co. of Pittsburgh, PA*, 220 F.R.D. 349, 352 (N.D. Cal. 2003); *In re Nexus 6p Prod. Liab.*
19 *Litig.*, No. 17-cv-2185, 2017 WL 3581188, at *2 (N.D. Cal. Aug. 18, 2017) (staying discovery
20 pending motion to dismiss contesting personal jurisdiction).

21 Plaintiff mistakenly relies on a case that preceded *Pacific Lumber* by over a decade for the
22 proposition that the Court must be "convinced that the plaintiff will be unable to state a claim for
23 relief." (ECF 52 at 2 (citing *Twin City Fire Ins. Co. v. Employers Ins. of Wausau*, 124 F.R.D. 652,
24 653 (D. Nev. 1989).) But *Twin City* in turn quotes *Wood v. McEwen*, 644 F.2d 797 (9th Cir. 1981),
25 which addressed a different issue: whether a court could *continue* an already-existing stay while
26 plaintiff moved to file second, third, and fourth amended complaints. *See* 644 F.2d 799-800. *Wood*,

1 and the line of cases relying on it, do not recite the applicable standard here; under the applicable
 2 *Pacific Lumber* standard, it is enough for Defendants to show their motion *may* be case dispositive.

3 Moreover, while “a pending *motion* must be potentially dispositive of the entire case,” no
 4 particular *argument* need be case dispositive. *Pac. Lumber*, 220 F.R.D. at 352 (emphasis added).
 5 In evaluating a stay request, the Court must look to whether all the arguments in the motion, taken
 6 together, are potentially case dispositive:

7 Google and Huawei move to dismiss the Consolidated Amended
 8 Complaint on different grounds. The Court is satisfied that the
 9 personal jurisdiction argument is potentially dispositive of the entire
 10 case as to Huawei. And the Court finds that Google’s motion to
 11 dismiss could be potentially dispositive of the express warranty
 claims, which in turn would limit the scope of discovery. Defendants
 have satisfied their burden to obtain a limited stay of discovery in
 this case.

12 *In re Nexus 6p Prod. Liab. Litig.*, 2017 WL 3581188, at *2 (cleaned up).

13 Defendants’ motion meets this standard. Amneal’s personal jurisdiction argument is
 14 potentially dispositive as to all claims against Amneal. Defendants’ preemption argument is
 15 potentially dispositive as to all claims against both Amneal and CVS (and, in fact, Defendants’
 16 Motion to Dismiss makes separate preemption arguments specific to CVS (ECF 47 at 15)).
 17 Although Defendants’ Motion to Stay discusses personal jurisdiction and preemption as potentially
 18 case-dispositive issues that together are enough to satisfy *Pacific Lumber*, Defendants put forth
 19 several other arguments in their Motion to Dismiss, including lack of standing and failure to plead
 20 facts necessary state a claim under Rule 12(b)(6) that, taken as a whole and in various permutations,
 21 also would require dismissal of all of Plaintiff’s claims. *See Muhmoud*, 2022 WL 16855573, at *2
 22 (granting a stay where dispositive motions argued that plaintiff “failed to allege the necessary facts
 23 for their respective category of claims and invoke[d] prosecutorial and qualified immunities”).

24 For these reasons, Defendants have fully satisfied the first prong of the *Pacific Lumber* test,
 25 and no further analysis of the merits of Defendants’ Motion to Dismiss is needed or appropriate.

a. *Defendants' preemption arguments are not frivolous*

Whether an argument is “availing” and “likely to dispose of the entire case” has no place in the *Pacific Lumber* analysis, as explained above. But even if it did, Plaintiff’s contention that Defendants’ preemption arguments are “unavailing” and “unlikely to dispose of the entire case” is just wrong. As an initial matter, Courts can, and routinely do, dismiss claims on preemption grounds at the pleadings stage. *See, e.g., Puri v. Costco Wholesale Corp.*, No. 5:21-CV-01202-EJD, 2021 WL 6000078, at *5 (N.D. Cal. Dec. 20, 2021); *Sidhu v. Bayer Healthcare Pharms. Inc.*, No. 22-CV-01603-BLF, 2022 WL 17170159, at *6 (N.D. Cal. Nov. 22, 2022) (granting motion to dismiss without leave to amend based on federal preemption); *In re Bextra & Celebrex Mktg. Sales Pracs. & Prod. Liab. Litig.*, No. 05-1699 CRB, 2006 WL 2374742, at *10 (N.D. Cal. Aug. 16, 2006) (granting motion to dismiss based on preemption with leave, but warning plaintiffs to replead only if they “in good faith believe they can amend their claims consistent with the Court’s order”).

The FDCA expressly preempts state law claims that impose requirements that are “different from,” “in addition to,” or “not identical with” those of federal law. 21 U.S.C. § 379r(a). As Defendants discuss in their Motion to Dismiss, FDA approved Defendants’ products as formulated, as manufactured, and as labeled, and Plaintiff neither has pled, nor can plausibly plead, that Defendants’ products are anything other than what Amneal submitted in the FDA-approved ANDA. (ECF 47 at 18-19.) Plaintiff attempts to avoid preemption by casting her claim as one that Amneal “simply could have used a different carbomer.” (ECF 52 at 5). But the FDCA does not currently require a different carbomer, and Amneal cannot change the products without prior FDA approval. (ECF 47 at 10-12, 14, 19.) Because Plaintiff seeks to impose requirements “different from,” “in addition to,” or “not identical with” those of federal law, federal law preempts her claims.

In addition, Plaintiff makes the circular argument that her claims premised on violation of California’s Sherman Law are not preempted because the Sherman Law imposes the same requirements as the FDCA. While the Sherman Law has been amended to incorporate the standards of the FDCA, *see Davidson v. Sprout Foods, Inc.*, 106 F.4th 842, 845 (9th Cir. 2024), as Defendants

1 explain in their Motion to Dismiss, Plaintiff's claims, as pled, either seek to impose obligations on
 2 Defendants that conflict with what the FDCA requires and permits, or fail to plead violations of the
 3 FDCA. (ECF 47 at 10-14, 18-19); *see also Howard v. Alchemee, LLC*, No. , 2024 WL 4272931, at
 4 *8 (C.D. Cal. Sept. 19, 2024) (rejecting "Plaintiffs' argument that their claims are parallel to the
 5 FDCA's general prohibition on misbranded drugs, which prohibits labels that are 'false or
 6 misleading in any particular,'" when the warnings plaintiffs alleged were required differed from
 7 "the exact warnings" required by the FDCA). Either way, Defendants' Motion to Dismiss is indeed
 8 potentially dispositive of Plaintiff's claims premised on violations of California's Sherman Law.

9 Finally, Plaintiff attempts to distinguish *Federal National Mortgage Association v. 6955 N*
 10 *Durango Trust*, 2018 WL 10468032, at *1 (D. Nev. Apr. 4, 2018), where the Court stayed
 11 proceedings pending resolution of a motion to dismiss based on preemption, on the ground that the
 12 preemption at issue in *Durango* "had nothing to do with FDA preemption." (ECF 50 at 6-7.) That
 13 is a distinction without a difference. The question is whether Defendants' motion is potentially
 14 case-dispositive; including but not limited to Defendants' preemption argument, it is.

15 *b. Amneal's personal jurisdiction argument is not frivolous*

16 Like with preemption, whether Amneal's argument that this Court lacks personal
 17 jurisdiction over it is "availing" and "likely to succeed" has no bearing on the required stay analysis.
 18 Amneal's argument, however, is not frivolous. In her Opposition, Plaintiff restates the allegations
 19 in her Complaint (ECF 52 at 3) but ignores the controlling case law Defendants relied on in their
 20 Motion to Dismiss that renders those allegations insufficient. *See, e.g.*, ECF 47 at 7-9 (citing, *e.g.*,
 21 *Thomson v. Anderson*, 113 Cal. App. 4th 258, 268 (2003) (explaining that "designation of an agent
 22 for service of process and qualification to do business in California alone are insufficient to permit
 23 general jurisdiction"); *id* at 9 (explaining that mere foreseeability that a product will arrive in
 24 California through the stream of commerce is not enough and citing *Bombardier Recreational*
 25 *Prods., Inc. v. Dow Chem. Canada ULC*, 216 Cal. App. 4th 591, 602-03 (2013)).

Even if Plaintiff's arguments on the merits were relevant, which they are not, her argument as to why she has plausibly pled specific personal jurisdiction over Amneal relies wholly on *Digitech Image Techs., LLC v. Mamiya Digital Imaging Co.*, No. 8:12-CV-1675-ODW, 2013 WL 1415121, at *4 (C.D. Cal. Apr. 8, 2013). That case is distinguishable and inapposite on its face. In *Digitech*, the manufacturer defendant listed the "California locations on its website where consumers [could] purchase its products." *Digitech*, 2013 WL 1415121, at *1. Here, Amneal does not advertise the products at issue as being for sale in California. Nor does Amneal market the products on its website or even include them in its U.S. products catalog. (ECF 47 at 9-10; ECF 48 ¶ 11.) Amneal's relationship with its New York-based distributor is more like that in *Bombardier Recreational Prods., Inc. v. Dow Chem. Canada ULC*, 216 Cal. App. 4th 591 (2013). As was the case there, Amneal's involvement with the products ends at its distributor's facility in New York—the distributor purchases the products from Amneal in bulk, repackages and relabels them with various retailers' labels, and sells them to those retailers. (ECF 47 at 9; ECF 48 ¶ 9; ECF 48-1); *see also Bombardier*, 216 Cal. App. 4th at 595.

Under the first *Pacific Lumber* prong, the Court need only determine whether the motion has the potential to be case-dispositive. Here, Defendants' Motion to Dismiss is nonfrivolous, and if the Court rules in Defendants' favor, their Motion to Dismiss is plainly dispositive of the entire case. Defendants thus satisfy the first *Pacific Lumber* factor. *See Muhmoud*, 2022 WL 16855573, at *2 ("Without opining on the merits of the Dispositive Motions, the Court finds that, if granted, they would be dispositive of all claims in the FAC.").

2. Discovery is not necessary to decide Defendants' Motion to Dismiss

With respect to the second prong of the *Pacific Lumber* test, Plaintiff says that further discovery is not necessary to resolve Defendants' Motion to Dismiss but states that "if the Court Disagrees," she is entitled to discovery "to confirm jurisdiction over the Amneal Entities" and so she "may use the discovery to bolster her claims in [any] amended pleadings." (ECF 52 at 7.)

1 To the extent Plaintiff is asking, she has not met the burden for jurisdictional discovery.
 2 Such discovery “should ordinarily be granted where pertinent facts bearing on the question of
 3 jurisdiction are controverted or where a more satisfactory showing of the facts is necessary.”
 4 *Butcher’s Union Local No. 498 v. SDC Inv., Inc.*, 788 F.2d 535, 540 (9th Cir.1986). “[L]ittle more
 5 than a hunch that [discovery] might yield jurisdictionally relevant facts” is not enough to warrant
 6 jurisdictional discovery.” *Boschetto v. Hansing*, 539 F.3d 1011, 1020 (9th Cir. 2008); *see also*
 7 *Butcher’s Union*, 788 F.2d at 540 (“In their brief, the Unions state only that they ‘believe’ that
 8 discovery will enable them to demonstrate sufficient California business contacts to establish the
 9 court’s personal jurisdiction. This speculation does not satisfy the requirement that they make ‘the
 10 clearest showing’ of actual and substantial prejudice [to show an abuse of discretion on appeal].”).

11 Here, in an effort to establish personal jurisdiction, Plaintiff alleges that Amneal is
 12 registered to do business in California, has appointed an agent in California for service of process,
 13 and sells product to a distributor that maintains a distribution facility in California. (ECF 52 at 3.)
 14 Amneal does not contest those facts for purposes of its Motion to Dismiss, but rather maintains that
 15 they are not enough as a matter of law. In addition, Amneal has submitted a declaration and
 16 documents showing, unequivocally, that Amneal does not sell the products into California, Amneal
 17 does not market the products at issue on its website, and that the New York distributor to whom
 18 Amneal sells the products in bulk repackages, relabels, and has complete control over the sale and
 19 marketing of the products to retailers. (ECF at 9-10; ECF 48 ¶¶ 9, 11; ECF 48-1.)

20 Plaintiff has not identified any pertinent facts bearing on the question of jurisdiction that
 21 are controverted or in need of “a more satisfactory showing.” The facts are not contested, and the
 22 Court can and should decide personal jurisdiction as a matter of law. *See Butcher’s Union*, 788
 23 F.2d at 540; *Boschetto*, 539 F.3d at 1020; *Mauricio v. Suncrest Health Servs., LLC*, No. 22-cv-
 24 2698, 2023 WL 20266530, at *3 (N.D. Cal. Feb. 15, 2023) (Davila, J.) (rejecting jurisdictional
 25 discovery when “[t]he commanding weight of the evidence” pointed against a finding of
 26
 27

jurisdiction and a “request for jurisdictional discovery on these facts is ‘based on little more than a hunch that it might yield jurisdictionally relevant facts’” (quoting *Boschetto*, 539 F.3d at 1020)).

Indeed, Plaintiff’s purported justification for jurisdictional discovery is, at best, just an insufficient “hunch” that she might obtain facts she could use to amend her complaint. For example, Plaintiff’s Opposition states that “[a]fter Plaintiff obtains documents from PLD and discovery from Defendants, there would be a *potential need* for further amendments to the complaint. Because the *potential* for an amended pleading exists and several of Plaintiff’s discovery requests are directly related to . . . personal jurisdiction . . . Plaintiff *may* use the discovery to bolster her claims in those amended pleadings.” (ECF 52 at 7 (emphasis added).) This is plainly insufficient.

Plaintiff also contends that Defendants have undermined their own argument by submitting a declaration and exhibits regarding personal jurisdiction with their Motion to Dismiss. In doing so, Plaintiff again fails to identify any fact “in need of a more satisfactory showing,” which is the standard, and overlooks that courts can consider evidence presented in affidavits and declarations when analyzing motions to dismiss for lack of personal jurisdiction. *See Schwarzenegger v. Fred Martin Motor Co.*, 374 F.3d 797, 800 (9th Cir. 2004); *Smith v. Facebook, Inc.*, 262 F. Supp. 943, 949 (N.D. Cal. 2017) (Davila, J.); *Fitzgerald v. GEM Funding, LLC*, No. 5:21-cv08641-EJD, 2022 WL 4537881, at *2 (N.D. Cal. Sept. 28, 2022) (Davila, J.).

Finally, even if Plaintiff had made a showing to support limited jurisdictional discovery, which she has not, such showing would not justify the broad merits discovery that Plaintiff intends to pursue—and in fact has already served on Defendants—while Defendants’ Motion to Dismiss is pending. To the extent any discovery is allowed, which it should not be, that discovery should be narrowly tailored to resolving contested facts necessary to decide personal jurisdiction.

B. Engaging in Discovery Before the Court Decides Defendants’ Motion to Dismiss Would Be Inefficient and Highly Burdensome

Finally, Plaintiff argues that discovery should proceed because (a) if the Motion to Dismiss is granted, “the only subject of discovery that would change is jurisdictional discovery”; (b) even

1 if some of Plaintiff's claims are preempted, her "claims under the UCL will remain and therefore,
2 the need for discovery would not be altered"; (c) Plaintiff has unilaterally determined that because
3 her discovery is not burdensome, it should be permitted to proceed; and (d) discovery is necessary
4 to permit the efficient resolution of this case. (ECF 52 at 8-9.) Each of these arguments fails.

5 First, Plaintiff again ignores the fact that Defendants are moving to dismiss on several
6 grounds as to all Defendants. (*See, e.g.*, ECF 52 at 7-9 (listing issues for the Court to decide).)
7 Therefore, Plaintiff is simply incorrect when she states that the claims against CVS would
8 necessarily proceed even if Amneal is not subject to jurisdiction in California. The same is true
9 with respect to Plaintiff's UCL claims, which Defendants contend Plaintiff inadequately pled and,
10 as discussed above, are in fact subject to preemption.

11 Second, Plaintiff cites no law for the proposition that the party propounding discovery can
12 unilaterally determine their discovery is not burdensome. (ECF 52 at 8-9). Plaintiff's attempt to
13 distinguish *Arcell v. Google LLC*, 5:22-CV-02499-EJD, (N.D. Cal. Oct. 31, 2022), on the grounds
14 that it was an antitrust suit is futile. (ECF 52 at 8). This Court stayed discovery in *Arcell* because it
15 imposed an unnecessary burden on the defendants while a dispositive motion was pending. *See*
16 *Arcell*, 2022 WL 16557600, at *1 (explaining that "[t]he purpose of F.R.Civ.P. 12(b)(6) is to enable
17 defendants to challenge the legal sufficiency of complaints without subjecting themselves to
18 discovery"). Here, as in *Arcell*, Plaintiff has propounded burdensome discovery in a complex case
19 while a case-dispositive motion is pending. Indeed, Plaintiff has already served extraordinarily
20 broad merits discovery requests on both Amneal and CVS. *See* Concurrently filed Declaration of
21 Robin P. Sumner Exs. 1-3. These discovery requests include 13 to 15 interrogatories to each
22 Defendant and 35 to 36 requests for production of documents to each Defendant (*i.e.*, 106 document
23 requests total). *See id.* The discovery requests seek, among other things, sales records, product
24 formulation and testing documents, documents on the carbomer used in the products, government
25 communications, communications with distributors and repackagers, abbreviated new drug
26 applications, communications between the Defendants, and all documents that Defendants plan to
27

1 introduce at class certification or at trial. *See id.* This is exactly the type of “broad, time-consuming
 2 and expensive” discovery that this Court found merited a stay in *Arcell*. *See* 2022 WL 16557600,
 3 at *1.

4 Finally, Plaintiff suggests that a short pause in discovery will impede efficient resolution of
 5 this case. (ECF 52 at 8-9). Plaintiff’s reliance on the deadline for class certification assumes that
 6 this Court will deny the Motion to Dismiss and is contrary to the law in this District, which
 7 encourages stays until potentially case-dispositive motions are resolved. In addition, while Plaintiff
 8 attempts to rely on the Court’s referral to mediation to suggest a need for full discovery, that
 9 mediation is not scheduled to occur until after Plaintiff pleads claims that withstand a motion to
 10 dismiss and Defendants answer. That provides more than enough time to exchange the information
 11 needed to engage in early mediation. The precise point of scheduling mediation early is to see if
 12 the parties can resolve the case before incurring the extraordinary expense of litigation, particularly
 13 expenses associated with discovery and class certification experts. Saving the parties the burden
 14 and expense of broad merits discovery, as well as the Court’s resources in overseeing such
 15 discovery, when the Court may well dismiss the entire case, is far more efficient than the alternative
 16 and outweighs any potential delay or possible slight amendment to the Case Management Order (if
 17 necessary) to account for the time it takes the Court to rule on Defendants’ Motion to Dismiss.

18 **III. CONCLUSION**

19 For the foregoing reasons, Defendants respectfully request this Court stay discovery until
 20 the Court rules on Defendants’ pending Motion to Dismiss.

21 Dated: March 13, 2025

TROUTMAN PEPPER LOCKE LLP

22 By: /s/ Robin P. Sumner

23 Robin P. Sumner (admitted *pro hac vice*)

24 Kyle A. Dolinsky (admitted *pro hac vice*)

25 Attorneys for Defendants

26 CVS Pharmacy, Inc.

27 Amneal Pharmaceuticals of New York, LLC, and

Amneal Pharmaceuticals LLC